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Organization: Hungry Mountain

Title:

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My husband and I have been Ranching and farming at [redacted] for 50+ years We have 85 irrigated acres. The Ranch has been continuously irrigated since 1891 and has been identified as having rare and unique, deep fine, sandy loam soils that are easily eroded. Hungry Mountain Ranch has over a mile of McFarland Creek running through it. We have seen an increased flow out of the McFarland Creek Watershed since the USFS instituted widespread use of prescription burning in it. Farm soils in the Methow Valley are usually under 2 percent organic matter, and watersheds have a disadvantage of having less than that. We attended meetings with the USFS at the Zahn Ranch decades ago when the Twisp Ranger District presented the new Hungry-Hunter Project area as a showcase for the ultimate new management of its forest lands. The Project promoted an introduction of controlled burns selective logging and intensive thinning and slash management. At that time we were grazing permit holders on the Forest Service which continued for 28 years. For 28 years we became intimate with the forests and the USFS management in the watershed While we understand the need for a more intensive management of the forest by the USFS we also understand on a day-to-day basis the impacts that widespread burning of the forest floor has had on down creek landowners. We all have had to manage ever increasing volume and velocity of water and the financial and physical burdens that has placed on them as they try to keep their soils from running off their land and ending up with downstream neighbors and eventually backing up in the hydroelectric dam pools

Keep in mind that for us, these issues preceded the Carlton Complex Fire by ten years following the year after year of broadcast burning of the forest using helicopters emitting incendiaries and by other means.

1. We think that prescribed burns may help to better manage a forest in cases where they are not done in steep watersheds as we have in the third order tributaries of the Methow Valley Ignoring gravity has had dire consequences on the preservation of our soil resources. Scorching the earth with prescriptive burning decreases the vegetation of the forest floor and drastically lowers the amount of water absorbed. Most places in the watershed now have only about 1/8 inch of duff on top of the sort which accounts for the rapid runoff during snowmelt We have already spent more than \$60,000.00 on new infrastructure - new culverts, retention ponds, armored waterways, dykes and diversions to deal with the increases in water. Additionally, anytime you disturb soil you get weeds that must be dealt with as an additional negative consequence The sand and soils coming from our upstream neighbors inability to control erosion as a result of prescriptive burning on the upstream USFS watershed fills our ponds and waterways and makes pressure irrigation impossible

2. The USFS new management policy of promoting prescriptive burning is like taxation without representation. We have been told by the Twisp Ranger District that they intend to burn the Valley Watersheds every ten years We are requesting if the current scorch the earth policy continues that you include down creek private property owners in the planning and approval process. We are the ones dealing with the costs and consequences of your actions. It would be entirely appropriate for the USFS to be mandated to create a Coordinated Resource Management Program that included all affected landowners and agencies

3 In our view ALL agencies must work to resolve these issues in a Holistic, sensible and accountable manner We all need to work together for responsible watershed management that is not excluded in future forest management considerations.